AT&T, the CLEC Alliance, WorldCom, and Cablevision Lightpath criticize the GRIP proposal on various legal and policy grounds. Citing the FCC's observation that the 1996 Act allows competing carriers "to deliver traffic terminating on an incumbent LEC's network at any technically feasible point on that network, rather than obligating such carriers to transport traffic to less convenient or efficient interconnection points,"[379] AT&T contends that the GRIP proposal would impose just such an anticompetitive requirement on CLECs, requiring them to deploy statewide networks to achieve multiple interconnections. It charges that the proposal would transfer to the CLECs transport costs both for originating and terminating local calls, thereby taking "the 'reciprocal' out of reciprocal compensation,"[380] and it cites the Massachusetts Commission's rejection of a similar proposal. AT&T regards the virtual GRIP proposal as, in effect, a willingness on Verizon's part to negotiate alternative interconnection point arrangements with CLECs, and it argues that the better way to deal with the problem is through negotiation, without the GRIP proposal being treated as the default arrangement.

The CLEC Alliance argues to similar effect, adding that if the GRIP proposal is approved, the Commission should require Verizon to compensate CLECs for the additional transport that would be required, "because in this context [Verizon] is the customer and the CLEC is the wholesale provider of call termination functionality."[381] It argues as well that many CLECs have already designed their networks in reliance on existing arrangements that do not require GRIPs and that approval of the proposal would harm CLECs by requiring them to reconfigure their networks and to incur additional costs and delays. It urges rejection as well of the virtual GRIP proposal, disputing Verzion's claim that it is competitively neutral and alleging

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[379] Local Competition Order, ¶209.

[380] AT&T's Initial Brief, p. 134.

[381] CLEC Alliance's Initial Brief, p. 115.

that it assumes, incorrectly, that CLECs have the same ubiquitous presence that Verizon has.

WorldCom observes that Verizon's proposal would vitiate a CLEC's bargaining power over interconnection points by enabling Verizon to refuse the carrier's choice of interconnection point in favor of the default GRIP option. It urges the Commission to endorse real negotiations as the best way to decide interconnection points.

Lightpath, devoting its entire brief to this issue, contends the GRIP proposal would undermine the Commission's efforts to enhance competition as well as violate federal law. Lightpath describes itself as a full-service, facilities-based CLEC whose ability to serve its customers depends critically on efficient interconnection with Verizon's network. Pointing to its negotiated interconnection arrangements with Verizon, it contends that the GRIP proposal would undermine such arrangements and enhance Verizon's bargaining strength in future negotiations. It charges that the proposal violates the FCC rule barring a LEC from assessing charges to deliver traffic to another carrier and, even under the virtual GRIP variation, unlawfully reserves to the LEC the ability to decide where and how often a CLEC must interconnect. It cites, in this regard, the FCC's statement in its Texas §271 proceeding that "a competitive LEC has the option to interconnect at only one technically feasible point in each LATA."[382]

Beyond the legal issue, Lightpath contends the proposal contravenes sound public policy by hindering the development of alternative, more efficient networks, shifting the cost of transport to CLECs, and impairing the CLECs' ability to negotiate equitable interconnection arrangements. While Verizon regards the cost shifting as appropriate, Lightpath contends it is at odds with New York's procompetitive policies and cites as

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[382] Application by SBC Communications, Inc., et al. pursuant to §271 of the Telecommunications Act of 1996 to Provide In-Region InterLATA in Texas, CC Docket No. 00-65, Memorandum Opinion and Order (rel. June 30, 2000) ¶78.

well the Massachusetts Commission's rejection of GRIPs on that basis. It sees no reason for the Commission to alter its previous conclusion that GRIPs are unnecessary in view of the remedy adopted in the Reciprocal Compensation Reexamination Proceeding for imbalances created by convergent traffic. Finally, it contends that the record on GRIPs and virtual GRIPs is ambiguous, raising a variety of issues regarding just what Verizon is proposing.[383]

In response, Verizon defends the lawfulness of its proposal, contending that it is not attempting to avoid its obligation to provide interconnection at any technically feasible point but only to deal with who will bear the costs for delivering a local call from its point of origin to the interconnection point selected by the CLEC. It cites the FCC's statement that a CLEC wishing "a 'technically feasible' but expensive interconnection would, pursuant to [the 1996 Act], be required to bear the cost of that interconnection, including a reasonable profit."[384] It points as well to the statement in Local Competition Order ¶209, omitted by the CLECs in citing it, that "because competing carriers must usually compensate incumbent LECs for the additional costs incurred by providing interconnection, competitors have an incentive to make economically efficient decisions about where to interconnect." With respect to policy, Verizon contends CLECs should bear the costs they impose in offering their customers the benefits of wide area local calling and that the 1996 Act does not require the incumbent to subsidize those benefits. It reiterates its claim that GRIPs would not require construction of facilities and denies that establishing a generic rule that would prevail in the absence of an agreement would have an effect on negotiated agreements. It cites at length a decision of the

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[383] Lightpath identifies the issues at its Initial Brief, p. 12.

[384] Verizon's Reply Brief, p. 140, citing Local Competition Order, ¶199.

South Carolina Commission rejecting AT&T's argument against GRIPs.[385]

Lightpath's reply brief reiterates its legal and policy arguments, adding that ¶199 of the Local Competition Order does not undermine the rule that each carrier is responsible for delivering its own traffic to the other carrier's network. It argues as well that the costs transferred to CLECs would be passed on to their customers, including ISPs that would, in turn, pass the costs on to their users, thereby bearing out the Commission's concern about the effect of GRIPs on internet access in remote areas. Lightpath adds that Verizon's study purporting to show that its uncompensated transport costs exceed $2 million per year is both extra-record and flawed. The CLEC Alliance disputes the premise that the physical location of the CLEC customer receiving the call affects Verizon's transport obligations, contending that Verizon's transport cost is determined solely by the distance from the originating point (i.e., Verizon's customer) to the interconnection point and that any legitimate transport costs incurred by Verizon from originating traffic to CLEC designated interconnection points are already recovered through the price of UNEs and from Verizon's own retail customers. It adds that the CLEC industry has shown a willingness to work cooperatively with incumbent LECs in resolving these issues. It suggests that the proposal benefits Verizon primarily through its anticompetitive features.

The concerns that Verizon cites in support of GRIPs cannot be dismissed, and the proposal continues to enjoy a prima facie appearance of fairness. But the objections raised by the CLECs--including the relative impacts of the proposal on Verizon and its competitors, as well as the potential effect, noted by the Commission, on ISP access in remote areas--are likewise significant; and points of interconnection, when all is said and done, are among the matters to be thrashed out between the parties to interconnection agreements. Verizon acknowledges as

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[385] Verizon's Reply Brief, pp. 143-145.

much but nonetheless suggests that GRIPs should be adopted as the default arrangement to be applied in the absence of some other agreement between the parties. But the adoption of any such default arrangement would skew the negotiations, significantly strengthening Verizon's hand, and Verizon's suggestion to the contrary[386] appears unrealistic.

It appears to me that the better alternative is for the Commission to reaffirm its recognition of Verizon's concerns and its willingness to have them taken into account in any interconnection agreement arbitrations in which these issues may be posed or through other dispute resolution mechanisms. But the issues should be decided, in the first instance, through negotiation, and disputes that then remain should be resolved case-by-case.

OTHER ISSUES

Operator Services/Directory Assistance

Verizon proposed to price Operator Services/Directory Assistance above the level of TELRIC costs, given the FCC's determination that incumbent LECs were not required to offer unbundled access to (or TELRIC pricing for) OS/DA, as long as they offer customized routing (as Verizon does).[387] It cites the FCC's finding that there was a wholesale market in the provision of OS/DA services along with opportunities for CLECs to provision them on their own, and that a CLEC's ability to offer telecommunications services would not be materially diminished if OS/DA service were not offered as a UNE. In view of that decision, Verizon proposes a range of flexible rates for each OS/DA service, which could be changed on ten days' notice; the price range would use the TSLRIC of providing the service as a floor (though in view of the inability at this point to calculate TSLRIC, TELRIC would be used as a surrogate) and the market value of high quality OS/DA as a ceiling. Verizon notes

[386] Verizon's Reply Brief, pp. 142-143.

[387] Verizon's Initial Brief, citing UNE Remand Order, ¶¶439-465.

in this regard that other providers of wholesale OS/DA services do not tariff their services and are free to charge what the market can bear, and that the prevailing market rates for OS/DA services offered by other providers fall within its proposed range.

The Federal Agencies object to Verizon's proposal, contending that even though the FCC no longer requires TELRIC pricing of OS/DA, the Commission is free to impose it if it considers conditions in New York to warrant it and may designate UNEs in addition to those designated by the FCC. They maintain that Verizon's enormous market power within New York, as evidenced by its providing more access lines than ever to both residential and business subscribers, warrants TELRIC pricing of OS/DA services.

Verizon responds that the Commission may not designate OS/DA as a UNE, inasmuch as the FCC has determined that the service does not meet the standards for designation and that state commissions "must comply with the standards set forth in [that rule] when considering whether to require the unbundling of additional network elements."[388] It adds that market power in the offering of UNEs generally does not equate to market power in the offering of wholesale OS/DA services, and only the latter is relevant to pricing of those services. In their reply brief, the Federal Agencies allege an inconsistency between Verizon's request to treat OS/DA services as unregulated for pricing purposes and as regulated insofar as it seeks to recover the costs of providing those services in its UNE rates.[389]

Verizon's proposed treatment of this service seems reasonable and is recommended. The FCC has determined that OS/DA need not be treated as a UNE and priced at TELRIC, and the Federal Agencies have provided no persuasive policy reason for

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[388] Verizon's Reply Brief, p. 146, citing 47 CFR §51.317.

[389] Federal Agencies' Reply Brief, p. 13, citing the CLEC Alliance's Initial Brief, p. 18.

doing so, given the competitive nature of the service.[390] Their allegation of inconsistency in Verizon's treatment of these costs is likewise unpersuasive; as discussed above, Verizon seeks to recover OS/DA costs only from CLECs electing to take the service from Verizon.

Collocation Security Costs

In the Collocation Module (Module 2) of this proceeding, the Commission disallowed 25% of Verizon's claimed costs of security for cageless collocation but invited the parties to propose, in the present module, alternative ways of dealing with the concerns that underlay that decision. The primary basis for the disallowance was Verizon's having based its security cost presentation on its existing central offices, rather than on a TELRIC-based construct designed with collocation in mind. (The Commission had found use of the latter construct proper and for that reason used as the starting point for its analysis the Collocation Cost Model (CCM) that had been sponsored in that module by AT&T and WorldCom.) In addition, the Commission saw a need to avoid the risk of "gold-plating" inherent in traditional, cost-based regulation. The Commission summed up its decision as follows:

> Taking all these [previously noted] considerations into account, we will adopt [Verizon's] estimate of security costs (which is not unreasonable as a matter of calculation, if one disregards its non-TELRIC premise) but disallow some portion of those costs--primarily to respond to the failure to present a proper, TELRIC-based estimate, but also to guard against gold-plating and to recognize that CLECs are not the only beneficiaries. The record lacks any clear indication of the proper

[390] There is, accordingly, no need to reach the legal issues that might be posed by a state designating as a UNE a service that did not meet the FCC's criteria.

> disallowance or share to be assigned to [Verizon]--using a floor space allocator, as some CLECs suggest, may unfairly assign the lion's share of the costs to [Verizon]--and we will, for now, disallow 25% of [Verizon's] estimated security costs. The parties may propose different solutions, to be applied prospectively, in Module 3.[391]

In the ensuing rehearing order, the Commission reaffirmed that decision, elaborating to some extent on its basis.[392]

In the present module, Verizon claims to have developed security costs based on the configuration of the CCM's central office. It says it contemplated the same security measures as it did in Module 2, which had not been questioned by the Commission, and that its mix of security measures is efficient. It believes it met the requirements of the Module 2 decision, and that its costs--$171.05 per bay per month--should be allowed.

Rhythms/Covad object, contending that Verizon failed to explain how it developed its mix of security measures, which include wire mesh partitions and security cameras in every collocation arrangement, and that there is no way for the Commission to evaluate Verizon's assumptions. Noting that the costs claimed here in fact exceed those sought by Verizon in Module 2, they charge Verizon with blatantly disregarding the Commission's directive to assign itself some portion of the costs and with doing nothing to assuage the Commission's concerns about gold plating. For all these reasons, they assert Verizon has failed to bear its burden of proof, and they urge that the rate be set, consistent with their proposal to allocate costs on the basis of floor space in the CCM central office, at $2.37 per bay per month.[393]

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[391] Collocation Opinion, p. 30.

[392] Case 98-C-1357, Order Denying Petitions for Rehearing of Opinion No. 00-08, (Collocation Rehearing Order) pp. 6-7.

[393] Rhythms/Covad's Initial Brief, p. 46.

Verizon responds that it fully explained its security cost calculation[394] and that Rhythms/Covad declined to cross-examine on the subject. It maintains that it used the same installed security investments used in Module 2-- which, it repeats, the Commission did not question--and applied them to the CCM central office configuration. It thereby complied with the Commission's Module 2 determination, and it sees no basis for challenging its result simply because it produces higher rates than those sought in Module 2. Verizon denies any violation of the Commission's directive to allocate security costs to itself, contenting that Rhythms/Covad misunderstand the Module 3 disallowance, which was premised on the failure, now remedied, to base costs on the CCM central office configuration. Finally, it disputes Rhythms/Covad's floor-space allocation formula, asserting that it effectively allocates security costs to space that does not benefit from the cageless security measures, including caged collocation areas.

Verizon has remedied its failure to base security costs on a forward-looking construct, which was the primary basis for the Commission's Module 3 disallowance. But I cannot disregard the Commission's concern, reiterated in the Module 3 Rehearing Order, about possible gold-plating, which it described as

> a risk that has long been recognized in cost-based regulation (sometimes disparaged on that account as "cost-plus" regulation) and that accounts, in part, for the movement more recently to incentive regulation.[395]

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[394] Citing Tr. 3,218-3,219.

[395] Collocation Rehearing Order, p. 7.

Verizon relied entirely on its Module 2 presentation with regard to the nature of its security measures,[396] contending the Commission did not call them into question and that they accordingly may be assumed here. But that overstates the case. The Commission noted the difficulty and impracticability of evaluating specific security measures and then concluded:

> while we should not assess particular security measures, we must take care that [Verizon] be denied any opportunity to gold-plate its security systems at the CLECs' expense. One way to do so is to require [Verizon] to bear a portion of the costs at issue, thereby vitiating any incentive to gold-plate.[397]

Consistent with that observation by the Commission, and recognizing that Verizon has adequately addressed the TELRIC issue that concerned the Commission as well, I recommend that 10%, rather than 25%, of Verizon's currently claimed cageless collocation security costs be disallowed.

CONCLUSION

Verizon's UNE rates should be set in a manner consistent with the conclusions in this recommended decision. Switching investment adjustments are summarized in Appendix B. The principal UNE rates that result from the recommendations made here are set forth, with their derivations, in Appendix C.[398]

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[396] Contrary to Rhythms/Covad, Verizon provided more than a vague two-sentence explanation of how it calculated its costs. But the explanation pertained to how the security measures had been applied to the CCM central office, not to how the security measures to be used had been determined.

[397] Collocation Opinion, p. 29.

[398] Switching rates are set forth on a zone-by-zone basis, as in Verizon's cost presentation. In its brief on exceptions, Verizon should recalculate a statewide average rate on this basis.

Verizon should include, in its brief on exceptions, recalculated rates for all UNEs. If necessary, Staff will be available to consult with Verizon (and other parties) on the processes to be followed.

JAL:gds
May 16, 2001

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VERIZON NEW YORK INC.
Summary of Switching Investment Adjustments
To Verizon's Cost Studies

Links Per Density Zone

	Zone 1A	Zone 1B	Zone 2	Total
Verizon Part A-1 Section 8.1 Page 2	2,960,461	6,274,583	3,155,223	12,390,267
	23.89%	50.64%	25.47%	100.00%

Verizon Part B-2, Section 4, Page 1 of 3
3rd Revision 10-19-00

	Zone 1A	Zone 1B	Zone 2	Average
Total Local Switch - SCIS	$7,473,825	$6,132,768	$5,734,682	$6,351,818
Lines Per Switch	61,000	56,500	33,525	
Investment Per Line	$122.52	$108.54	$171.06	$127.80
Total Non Traffic Sensitive (NTS)	$3,233,855	$2,311,632	$1,531,904	$2,333,422
NTS Allocation	43.27%	37.69%	26.71%	
Total Traffic Sensitive (TS)	$4,239,970	$3,821,136	$4,202,778	$4,018,396
TS Allocation	56.73%	62.31%	73.29%	

RD Per Line Investment

	Zone 1A	Zone 1B	Zone 2	Average
Total Local Switch Investment	$6,405,000	$5,932,500	$3,520,125	$5,431,077
Lines Per Switch	61,000	56,500	33,525	
RD Per Line Investment	$105.00	$105.00	$105.00	$105.00
Total Non Traffic Sensitive (NTS)	$4,227,300	$3,915,450	$2,323,283	$3,584,511
NTS Allocation	66.00%	66.00%	66.00%	
Total Traffic Sensitive (TS)	$2,177,700	$2,017,050	$1,196,843	$1,846,566
TS Allocation	34.00%	34.00%	34.00%	

VERIZON NEW YORK INC.
Summary of Switching Investment Adjustments
To Verizon's Cost Studies

VERIZON NEW YORK, INC.
Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
LINKS:			
2-Wire Analog Link DS-O-Density Zone 1 a	$15.90		$10.65
2-Wire Analog Link DS-O-Density Zone 1 b	$19.31		$12.69
2-Wire Analog Link DS-O-Density Zone 2	$26.39		$17.43
2-Wire Analog Link DS-1 -Density Zone 1 a	$10.77	$4.18	$7.29
2-Wire Analog Link DS-1 -Density Zone 1 b	$15.31	$7.70	$10.21
2-Wire Analog Link DS-1 -Density Zone 2	$21.99	$18.84	$14.70
2-Wire Digital Link DS-O-Density Zone 1 a	$21.84		$14.55
2-Wire Digital Link DS-O-Density Zone 1 b	$29.71		$17.69
2-Wire Digital Link DS-O-Density Zone 2	$39.94		$24.35
2-Wire Digital Link DS-1 -Density Zone 1 a	$17.16		$11.69
2-Wire Digital Link DS-1 -Density Zone 1 b	$24.64		$15.12
2-Wire Digital Link DS-1 -Density Zone 2	$34.33		$21.48
4-Wire Analog Link DS-O-Density Zone 1 a	$41.84		$27.82
4-Wire Analog Link DS-O-Density Zone 1 b	$50.97		$29.66
4-Wire Analog Link DS-O-Density Zone 2	$63.89		$37.77
4-Wire Analog Link DS-1 -Density Zone la	$28.90		$20.21
4-Wire Analog Link DS-1 -Density Zone 1 b	$37.81		$23.34
4-Wire Analog Link DS-1 -Density Zone 2	$50.18		$31.16
4-Wire Digital Link DS-1 -Density Zone la	$122.32	$28.61	$82.87
4-Wire Digital Link DS-I-Density Zone 1 b	$146.65	$43.32	$87.44
4-Wire Digital Link DS-I-Density Zone 2	$197.39	$69.24	$120.85
ADSL Copper Link	$32.66		$32.66
HDSL Capable Density Zone la		$1.53	
HDSL Capable Density Zone 1 b		$7.69	
HDSL Capable Density Zone 2		$23.41	
ADSL Capable Density Zone la		$1.20	
ADSL Capable Density Zone 1 b		$6.39	
ADSL Capable Density Zone 2		$19.02	
HDSL 2 Capable Density Zone la		$1.16	
HDSL 2 Capable Density Zone 1 b		$5.92	
HDSL 2 Capable Density Zone 2		$18.01	
ADSL Equipped Density Zone la		$12.40	
ADSL Equipped Density Zone 1 b		$15.78	
ADSL Equipped Density Zone 2		$26.25	
HDSL Capable Density Zone la		$28.61	
HDSL Capable Density Zone 1 b		$43.32	
HDSL Capable Density Zone 2		$69.24	
Wideband Access Testing	$1.99		$2.02
2-Wire Ground Start CSS Link Density Zone la	$3.22		$2.93
2-Wire Ground Start CSS Link Density Zone 1 b	$3.20		$2.91
2-Wire Ground Start CSS Link Density Zone 2	$3.21		$2.92

VERIZON NEW YORK, INC.
Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
LINKS (Continued From Previous Page)			
2-Wire Reverse Battery CSS Link Density Zone la	$5.22		$4.71
2-Wire Reverse Battery CSS Link Density Zone 1 b	$5.18		$4.67
2-Wire Reverse Battery CSS Link Density Zone 2	$5.19		$4.68
2-Wire EBS (P Phone) CSS Link Density Zone la	$17.70		$15.82
2-Wire EBS (P Phone) CSS Link Density Zone 1 b	$17.58		$15.72
2-Wire EBS (P Phone) CSS Link Density Zone 2	$17.62		$15.75
2-Wire Coin CSS Link Density Zone la	$2.99		$2.73
2-Wire Coin CSS Link Density Zone 1 b	$2.97		$2.71
2-Wire Coin CSS Link Density Zone 2	$2.97		$2.72
House and Riser			
Floor Access-Density Zone 1 a	$0.03		$0.02
Floor Access-Density Zone 1 b	$0.03		$0.02
Floor Access-Density Zone 2	$0.02		$0.01
Building Access-Density Zone 1 a	$1.51		$0.88
Building Access-Density Zone 1 b	$1.46		$1.27
Building Access-Density Zone 2	$1.15		$1 .oo
Building Set-up Charge Density Zone la	$857.31		$810.71
Building Set-up Charge Density Zone 1 b	$727.57		$688.02
Building Set-up Charge Density Zone 2	$637.04		$602.41
Terminal Connection Charge Density Zone 1 a	$328.70		$310.83
Terminal Connection Charge Density Zone 1 b	$276.86		$261.81
Terminal Connection Charge Density Zone 2	$241.59		$228.46
Network Interface Device			
2-Wire NID-Density Zone la	$1.64		$1.39
2-Wire NID-Density Zone 1 b	$1.56		$1.34
2-Wire NID-Density Zone 2	$1.39		$1.19
4-Wire NID-Density Zone la	$3.14		$2.66
4-Wire NID-Density Zone 1 b	$1.65		$1.42
4-Wire NID-Density Zone 2	$0.98		$0.84
DS1 NID-Density Zone la	$8.85		$7.52
DS1 NID-Density Zone 1 b	$8.70		$7.48
DS1 NID-Density Zone 2	$7.96		$6.83
Entrance Facilities			
OC-12 Fixed per Month	$3,833.67		$3,665.07
OC-12 per 1/4 Mile per Month	$8.18		$6.40
OC-3 Fixed per Month	$1,569.10		$1,506.05
OC-3 per 1/4 Mile per Month	$8.13		$6.37
STS1 Fixed per Month	$900.04		$880.91
STS1 per 1/4 Mile per Month	$10.90		$8.54
DS3 Fixed per Month	$903.19		$891 .00
DS3 per 1/4 Mile per Month	$10.90		$8.54

VERIZON NEW YORK, INC.
Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
LINKS **(Continued From Previous Page)**			
EEL Testing Costs			
Density Zone 1 a			
2-Wire Analog EEL (DS1) Density Zone 1 a	$0.36		$0.27
2-Wire Analog EEL (DSO) Density Zone 1 a	$0.54		$0.38
2-Wire Digital EEL (DS1) Density Zone la	$0.58		$0.43
2-Wire Digital EEL (DSO) Density Zone 1 b	$0.75		$0.55
4-Wire Analog EEL (DS1) Density Zone 1 a	$0.99		$0.76
4-Wire Analog EEL (DSO) Density Zone 1 b	$1.49		$1.06
4-Wire Digital EEL (DS1) Density Zone la	$4.23		$3.13
Density Zone 1 b			
2-Wire Analog EEL (DS1) Density Zone 1 b	$0.48		$0.36
2-Wire Analog EEL (DSO) Density Zone 1 b	$0.67		$0.48
2-Wire Digital EEL (DS1) Density Zone 1 b	$0.75		$0.56
2-Wire Digital EEL (DSO) Density Zone 1 b	$0.94		$0.69
4-Wire Analog EEL (DS1) Density Zone 1 b	$1.15		$0.88
4-Wire Analog EEL (DSO) Density Zone 1 b	$1.66		$1.19
4-Wire Digital EEL (DS1) Density Zone 1 b	$4.82		$3.57
Density Zone 2			
2-Wire Analog EEL (DS1) Density Zone 2	$0.67		$0.50
2-Wire Analog EEL (DSO) Density Zone 2	$0.87		$0.63
2-Wire Digital EEL (DS1) Density Zone 2	$1.03		$0.77
2-Wire Digital EEL (DSO) Density Zone 2	$1.24		$0.90
4-Wire Analog EEL (DS1) Density Zone 2	$1.49		$1.11
4-Wire Analog EEL (DSO) Density Zone 2	$2.01		$1.44
4-Wire Digital EEL (DS1) Density Zone 2	$6.41		$4.71
Sub-Loop Unbundling			
LINKS:			
2-Wire Digital Designed Metallic (18-30kft)			
Engineering Work Order	$881.73		$661.30
Engineering Work Order-Expedite	**$1,243.70**		$932.78
Removal of 1 Bridged Tap	$363.25		$267.58
Removal of 1 Bridged Tap-Expedite	$504.23		$374.99
Removal of Multiple Bridged Taps	$887.32		$656.31
Removal of Multiple Bridged Taps-Expedite	**$1,242.45**		$918.84
Removal of Load Coils (up to 21 kft)	**$1,061.73**		$786.26
Removal of Load Coils (up to 21 kft)-Expedite	**$1,486.65**		**$1,100.77**
Removal of Load Coils (up to 27kft)	**$1,410.92**		**$1,045.33**
Removal of Load Coils (up to 27kft)-Expedite	**$1,975.58**		**$1,463.46**
LINKS **(Continued From Previous Page)**			
2-Wire ADSL Compatible (less than 18kft)			
Engineering Work Order	$881.73		$661.30

VERIZON NEW YORK, INC.
Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	R R
A	B	C	D
Engineering Work Order-Expedite	$1,243.70		$932.78
Removal of 1 Bridged Tap	$363.25		$267.58
Removal of 1 Bridged Tap-Expedite	$504.23		$374.99
Removal of Multiple Bridged Taps	$887.32		$656.31
Removal of Multiple Bridged Taps-Expedite	$1,242.45		$918.84
2-Wire ADSL Compatible (less than 12kft)			
Engineering Work Order	$881.73		$661.30
Engineering Work Order-Expedite	$1,243.70		$932.78
Removal of 1 Bridged Tap	$363.25		$267.58
Removal of 1 Bridged Tap-Expedite	$504.23		$374.99
Removal of Multiple Bridged Taps	$887.32		$656.31
Removal of Multiple Bridged Taps-Expedite	$1,242.45		$918.84
2-Wire HDSL Compatible (less than 12kft)			
Engineering Work Order	$881.73		$661.30
Engineering Work Order-Expedite	$1,243.70		$932.78
Removal of 1 Bridged Tap	$363.25		$267.58
Removal of 1 Bridged Tap-Expedite	$504.23		$374.99
Removal of Multiple Bridged Taps	$887.32		$656.31
Removal of Multiple Bridged Taps-Expedite	$1,242.45		$918.84
4-Wire HDSL Compatible (less than 12kft)			
Engineering Work Order	$881.73		$661.30
Engineering Work Order-Expedite	$1,243.70		$932.78
Removal of 1 Bridged Tap	$363.25		$267.58
Removal of 1 Bridged Tap-Expedite	$504.23		$374.99
Removal of Multiple Bridged Taps	$887.32		$656.31
Removal of Multiple Bridged Taps-Expedite	$1,242.45		$918.84
2-Wire Digital Designed with ISDN Loop Electronics on Metallic			
Engineering Work Order	$881.73		$661.30
Engineering Work Order-Expedite	$1,243.70		$932.78
Removal of Load Coils (up to 21 kft)	$1,061.73		$786.26
Removal of Load Coils (up to 21 kft)-Expedite	$1,486.65		$1,100.77
Removal of Load Coils (up to 27kft)	$1,410.92		$1,045.33
Removal of Load Coils (up to 27kft)-Expedite	$1,975.58		$1,463.46
Addition of ISDN Loop Extension Electronics	$999.50		$876.75
Addition of ISDN Loop Extension Electronics-Expedite	$1,009.44		$885.57
2-Wire Analog Link With Line Sharing			
Residential Service Contribution Rate Element-Density Zone 1a*	$2.69		$1.82
Residential Service Contribution Rate Element-Density Zone 1 b*	$3.83		$2.55
Residential Service Contribution Rate Element-Density Zone 2*	$5.50		$3.67
POT Bay Termination (per 100 VG/month)	$2.00		$2.00
POT Bay Termination (per 100 VG-NRC)	$244.64		$244.64
Cable and Frame Termination (per 100 VG/month)	$14.35		$14.35

VERIZON NEW YORK, INC.
Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	R R
A	B	C	D
LINKS (Continued From Previous Page)			
Cable and Frame Termination (per 100 VG/NRC)	$1,499.35		$1,499.35
Bay/Relay Rack for Splitters (per arrangement/month)	$1.23		$1.23
Land and Building for Splitter Bay (per arrangement/month)	$3.55		$3.55
Maintenance of Splitter Equipment (per splitter/month)	$51.52		$17.91
Wideband Test Access (per line/month)	$1.99		$2.02
Splitter Installation Cost (serving 96 lines-NRC)	$1,369.60		$1,278.82
Line Sharing			
Line Sharing Conversion Non-Recurring Costs			
Service Order	$9.59		$9.59
Service Order-Expedite	$14.88		$14.88
Central Office Wiring initial	$41.53		$41.53
Central Office Wiring Initial-Expedite	$59.40		$59.40
Central Office Wiring Additional	$20.66		$20.66
Central Office Wiring Additional-Expedite	$29.55		$29.55
Provisioning	$0.27		$0.27
Provisioning-Expedite	$0.40		$0.40
Field Installation Dispatch	$121.35		$121.35
Field Installation Dispatch-Expedite	$170.92		$170.92
Manual Intervention Surcharge	$28.26		$28.26
Manual Intervention Surcharge-Expedite	$43.86		$43.86
Misdirected Trouble Report Dispatch In	$46.33		$46.33
Misdirected Trouble Report Dispatch In-Expedite	$67.87		$67.87
SWITCHING:			
Local Switching			
Analog Line Port-Density Zone Ia	$2.70		$2.68
Analog Line Port-Density Zone 1 b	$2.62		$3.16
Analog Line Port-Density Zone 2	$3.27		$3.18
Digital Line Port-Density Zone Ia	$1.17	$0.70	$1.35
Digital Line Port-Density Zone 1 b	$1.38		$1.83
Digital Line Port-Density Zone 2	$1.84		$1.94
Analog Coin Port-Density Zone Ia	$3.22		Not In RD
Analog Coin Port-Density Zone 1 b	$3.15		Not In RD
Analog Coin Port-Density Zone 2	$3.80		Not In RD
Digital Coin Port-Density Zone Ia	$1.27		Not In RD
Digital Coin Port-Density Zone 1 b	$1.48		Not In RD
Digital Coin Port-Density Zone 2	$1.95		Not In RD
Digital Trunk Port-Density Zone Ia	$125.82	$1.95	Not In RD
Digital Trunk Port-Density Zone 1 b	$135.24		Not In RD
Digital Trunk Port-Density Zone 2	$127.17		Not In RD
E911 Dedicated Port Density Zone Ia	$125.82		Not In RD
E911 Dedicated Port Density Zone 1 b	$135.24		Not In RD

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Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
SWITCHING (Continued From Previous Page)			
E911 Dedicated Port Density Zone 2	$127.17		Not In RD
Digital Tandem Port (Dedicated)	$235.40	$2.05	Not In RD
TOPS Trunk Port (Dedicated)	$35.16		Not In RD
Analog ISDN BRI Port-Density Zone la	$15.45		Not In RD
Analog ISDN BRI Port-Density Zone 1 b	$17.24		Not In RD
Analog ISDN BRI Port-Density Zone 2	$17.86		Not In RD
Digital ISDN PRI Port-Density Zone la	$153.84		Not In RD
Digital ISDN PRI Port-Density Zone 1 b	$177.05		Not In RD
Digital ISDN PRI Port-Density Zone 2	$169.97		Not In RD
Analog ISDN BRI Port-Density Zone la	$15.45		Not In RD
Analog ISDN BRI Port-Density Zone lb	$17.24		Not In RD
Analog ISDN BRI Port-Density Zone 2	$17.86		Not In RD
Digital ISDN BRI Port-Density Zone la	$2.92		Not In RD
Digital ISDN BRI Port-Density Zone 1 b	$3.60		Not In RD
Digital ISDN BRI Port-Density Zone 2	$4.19		Not In RD
ISDN PRI Port-Density Zone la	$124.57		Not In RD
ISDN PRI Port-Density Zone 1 b	$143.99		Not In RD
ISDN PRI Port-Density Zone 2	$137.78		Not In RD
Features			
Centrex			
Centrex Intercom-Density Zone la	$0.61		Not In RD
Centrex Intercom-Density Zone 1 b	$0.52		Not In RD
Centrex Intercom-Density Zone 2	$1.15		Not In RD
Centrex Announcement-Density Zone la	$1.05		Not In RD
Centrex Announcement-Density Zone 1 b	$1.05		Not In RD
Centrex Announcement-Density Zone 2	$1.05		Not In RD
3-Way Conference-Density Zone 1 a	$0.30		Not In RD
3-Way Conference-Density Zone 1 b	$0.30		Not In RD
3-Way Conference-Density Zone 2	$0.30		Not In RD
Automatic Callback-Density Zone 1a	$0.42		Not In RD
Automatic Callback-Density Zone 1 b	$0.42		Not In RD
Automatic Callback-Density Zone 2	$0.42		Not In RD
Distinctive Ringing-Density Zone 1 a	$0.03		Not In RD
Distinctive Ringing-Density Zone 1 b	$0.03		Not In RD
Distinctive Ringing-Density Zone 2	$0.03		Not In RD
Loudspeaker Paging-Density Zone la	$8.97		Not In RD
Loudspeaker Paging-Density Zone 1 b	$8.97		Not In RD
Loudspeaker Paging-Density Zone 2	$8.97		Not In RD
Meet-Me Conference-Density Zone 1 a	$0.19		Not In RD
Meet-Me Conference-Density Zone 1 b	$0.19		Not In RD
Meet-Me Conference-Density Zone 2	$0.19		Not In RD

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Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	R R
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SWITCHING **(Continued From Previous Page)**			
Selective Call Acceptance-Density Zone 1 a	$0.05		Not In RD
Selective Call Acceptance-Density Zone 1 b	$0.05		Not In RD
Selective Call Acceptance-Density Zone 2	$0.05		Not In RD
Selective Call Forwarding-Density Zone 1 a	$0.02		Not In RD
Selective Call Forwarding-Density Zone 1 b	$0.02		Not In RD
Selective Call Forwarding-Density Zone 2	$0.02		Not In RD
Selective Call Rejection-Density Zone 1 a	$0.31		Not In RD
Selective Call Rejection-Density Zone 1 b	$0.31		Not In RD
Selective Call Rejection-Density Zone 2	$0.31		Not In RD
Six Way Conference-Density Zone 1 a	$1.13		Not In RD
Six Way Conference-Density Zone 1 b	$1.13		Not In RD
Six Way Conference-Density Zone 2	$1.13		Not In RD
Station Message Detail Record-Density Zone 1 a	$19.12		Not In RD
Station Message Detail Record-Density Zone 1 b	$19.12		Not In RD
Station Message Detail Record-Density Zone 2	$19.12		Not In RD
Individual Line Features			
Three-way Calling-Density Zone 1 a	$0.30		Not In RD
Three-way Calling-Density Zone 1 b	$0.30		Not In RD
Three-way Calling-Density Zone 2	$0.30		Not In RD
Remote Call Forwarding-Density Zone 1 a	$0.98		Not In RD
Remote Call Forwarding-Density Zone 1 b	$1.18		Not In RD
Remote Call Forwarding-Density Zone 2	$1.40		Not In RD
Calling Number Delivery-Density Zone la	$0.07		Not In RD
Calling Number Delivery-Density Zone 1 b	$0.07		Not In RD
Calling Number Delivery-Density Zone 2	$0.07		Not In RD
Calling Number & Name-Density Zone la	$0.13		Not In RD
Calling Number 8 Name-Density Zone 1 b	$0.14		Not In RD
Calling Number & Name-Density Zone 2	$0.15		Not In RD
Call Waiting Display Number-Density Zone la	$0.00		Not In RD
Call Waiting Display Number-Density Zone 1 b	$0.00		Not In RD
Call Waiting Display Number-Density Zone 2	$0.00		Not In RD
Call Waiting Display Name-Density Zone 1 a	$0.00		Not In RD
Call Waiting Display Name-Density Zone la	$0.00		Not In RD
Call Waiting Display Name-Density Zone la	$0.00		Not In RD
Anonymous Call Rejection-Density Zone 1 a	$0.08		Not In RD
Anonymous Call Rejection-Density Zone 1 b	$0.08		Not In RD
Anonymous Call Rejection-Density Zone 2	$0.08		Not In RD
Automatic Recall (Call Return)-Density Zone la	$0.42		Not In RD
Automatic Recall (Call Return)-Density Zone 1 b	$0.42		Not In RD
Automatic Recall (Call Return)-Density Zone 2	$0.42		Not In RD

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Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
SWITCHING (Continued From Previous Page)			
ISDN Features			
Circuit Switched Voice Intercom-Density Zone 1 a	$14.68		Not In RD
Circuit Switched Voice intercom-Density Zone 1 b	$12.48		Not In RD
Circuit Switched Voice intercom-Density Zone 2	$27.58		Not In RD
Circuit Switched Voice Announce-Density Zone 1 a	$13.29		Not In RD
Circuit Switched Voice Announce-Density Zone 1 b	$13.29		Not In RD
Circuit Switched Voice Announce-Density Zone 2	$13.29		Not In RD
Six-way Conference Calling-Density Zone **1a**	$0.68		Not In RD
Six-way Conference Calling-Density Zone 1 b	$0.68		Not In RD
Six-way Conference Calling-Density Zone 2	$0.68		Not In RD
Three-way Calling-Density Zone la	$0.30		Not In RD
Three-way Calling-Density Zone 1 b	$0.30		Not in RD
Three-way Calling-Density Zone 2	$0.30		Not In RD
Calling Number Delivery-Density Zone **1 a**	$0.00		Not In RD
Calling Number Delivery-Density Zone **1** b	$0.00		Not In RD
Calling Number Delivery-Density Zone 2	$0.00		Not In RD
Calling Name Delivery-Density Zone la	$3.02		Not In RD
Calling Name Delivery-Density Zone 1 b	$3.26		Not In RD
Calling Name Delivery-Density Zone 2	$3.53		Not In RD
Voice Dialing	$1.49		Not In RD
Callability	$0.19		Not In RD
SMDI Port-Density Zone la	$207.25		Not In RD
SMDI Port-Density Zone 1 b	$207.25		Not In RD
SMDI Port-Density Zone 2	$207.25		Not In RD
Local ***Switch Usage***			
Originating-AHD (usage)-Density Zone **1** a	$0.003246	***$0.000000***	***$0.001082***
Originating-AHD (usage)-Density Zone **1** b	$0.002477		***$0.000833***
Originating-AHD (usage)-Density Zone 2	$0.005001		***$0.001588***
Terminating AHD (usage)-Density Zone **1** a	$0.002949		***$0.000982***
Terminating AHD (usage)-Density Zone **1** b	$0.002417		***$0.000813***
Terminating AHD (usage)-Density Zone 2	$0.004957		***$0.001576***
Common EO Trunk AHD (usage)-Density Zone la	$0.000603		***$0.000345***
Common EO Trunk AHD (usage)-Density Zone 1 b	$0.000603		***$0.000345***
Common EO Trunk AHD (usage)-Density Zone 2	$0.000523		***$0.000298***
Common Transport	$0.000455		***$0.000301***
Tandem and TOPS Usage (shared)			
Tandem Switch - AHD (usage)	***$0.000873***		$0.000409
Common Tandem Trunk - AHD (usage)	***$0.000867***		$0.000553
Common TOPS Trunk (MOU)	$0.000158		$0.000090

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Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	RD
A	B	C	D
SWITCHING **(Continued From Previous Page)**			
Local Switch Usage w/o Features			
Terminating Usage **w/o** Features Density Zone 1 a	**$0.002590**		Not In RD
Terminating Usage **w/o** Features Density Zone 1 b	$0.001640		Not In RD
Terminating Usage w/o Features Density Zone 2	$0.002345		Not In RD
Switch - Miscellaneous			
Two-Way Trunking	$3.10		Not In RD
***BACost Feature Study* - Sample**			
3-Way Conference-Density Zone 1 **a**	$0.42		Not In RD
3-Way Conference-Density Zone 1 b	$0.42		Not In RD
3-Way Conference-Density Zone 2	$0.42		Not In RD
TRANSPORT:			
IOF			
DS-0 Fixed	$34.02	$15.06	$28.12
DS-0 Mileage	$0.11		$0.08
DS-1 Fixed	$68.39	$109.51	$53.99
DS-1 Mileage	$0.11		$0.08
DS-3 Fixed	$888.74	$586.80	$701.52
DS-3 Mileage	$19.15		$14.98
STS-1 Fixed	$889.44		$702.08
STS-1 Mileage	$19.16		$14.99
OC-3 Fixed	$2,812.87		$2,220.34
OC-3 Mileage	$61.85		$48.40
OC-12 Fixed	$4,166.46		$3,288.79
OC-12 Mileage	$113.88		$88.23
0C-48 Fixed	$4,511.93		$3,561.49
OC-48 Mileage	$14.31		$10.49
CO ***Multiplexing***			
I/O Multiplexing (Common Equipment per Month)	$210.81		$166.40
1/0 Multiplexing (per Plug-in per Month)	$6.79		$5.36
3/1 Multiplexing	$560.47		$442.41
Dark Fiber			
Loop			
Central Ofice Fixed Cost per Month	$11.09		$9.34
Customer Premises Cost per Month	$4.69		$5.12
Mileage Cost per Month	$65.41		$54.16
Unusable Cost per Mile per Month	$56.11		$46.42
IOF			
Fixed Cost per Month	$22.18		$18.67
Mileage Cost per Month	$67.59		$53.21

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Summary of Proposed and Recommended Rates

Element/Nonrecurring Charge	Verizon Proposed	ATT/MCI Proposed	R R
A	B	C	D
TRANSPORT (Continued From Previous Page)			
SIGNALING SYSTEMS & DATABASES:			
STP Port	**$339.27**	$263.65	$262.00
LIDB Query	$0.000130	$0.000805	$0.000091
800 Query	$0.000183	$0.000425	$0.000128
Signaling Link (fixed per Month)	$34.01	$14.46	$28.12
Signaling Link (per Mile per Month)	$0.11		$0.08
E911 Common (shared) Port per Access Line/Month	$0.022		$0.019
OPERATOR SERVICES:			
OPH: Sent Paid, Pass Through, Calling Card/Sec	$0.014083		$0.013127
OPH: Sent Paid, Pass Through, Calling Card/Req	$0.387090		$0.360748
OPH: Calling Card per Request	*$0.498951*		*$0.465103*
OPH: Collect & Bill to 3rd Party per Request	$1.065170		$0.992500
Busy Line Verification (per second)	$0.014431		$0.013385
Busy Line Verification (per request)	$0.742613		$0.688781
Busy Line Verification/Interrupt (per second)	$0.014431		$0.013385
Busy Line Verification/Interrupt (per request)	$0.770753		$0.714881
Calling Card (Mechanized)/ Req	$0.178709		$0.136387
Collect and 3rd # Billing (Mechanized)/ Req	$0.178256		$0.137056
Directory Assistance per Request	$0.320366		$0.291863
Call Completion Additive/Req	$0.024595		$0.020737
Intercept per Request	$0.005935		$0.004674
Intercept per Line per Month	$0.021522		$0.016951
Branding per Call	$0.000752		$0.000620
Automated Coin Toll Service (ACTS) per Request	$0.010962		$0.008659
MISCELLANEOUS:			
Access to OSS per Loop or Resold Line per Month	$0.58		***$0.54***
ATLAS Display of Listings (DLA) per Request	$0.217		***$0.205***
Product and Service Availabilty (PSA) per Year	$8,082		***$7,643***
Street Address Guide (SAG) per Year	$7,049		***$6,666***
Daily Usage File (DUF) per Record	$0.001065		***$0.000994***
Daily Usage File (DUF) per Magnetic Tape	$23.09		***$21.56***
Electronic Customer Service Record Retrieval (CSR)	$0.001		$0.001
Nonrecurring Costs (NRCs)			
2-Wire New Initial Link			
Service Order	**$9.59**		**$8.95**
Service Order-Expedite	$14.88		$13.90
Central Office Wiring	$41.53		$39.31
Central Office Wiring-Expedite	$59.40		***$56.23***
Provisioning	$0.27		***$0.12***
Provisioning-Expedite	$0.40		***$0.18***